

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

| | | |
|--------------------------|---|-------------------------------|
| UNITED STATES OF AMERICA | : | Criminal Action No. 18-26-RGA |
| | : | |
| vs. | : | |
| | : | |
| JACLYN McCain a/k/a | : | |
| JACLYN SYKES | : | |

ORDER

AND NOW, this day of 2018, upon consideration of Defendant Jaclyn McCain's Motion to Extend Deadline By Which to File Pretrial Motions, **IT IS ORDERED** that said motion is **GRANTED**. She shall file and serve all pretrial motions on or before July 20, 2018. In addition, she waives her rights under the Speedy Trial Act, 18 U.S.C. Sections 3161 et seq., between May 21, 2018 and July 20, 2018.

RICHARD G. ANDREWS, J.

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FOR THE DISTRICT OF DELAWARE

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| UNITED STATES OF AMERICA | : | Criminal Action No. 18-26-RGA |
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| vs. | : | |
| | : | |
| JACLYN McCain a/k/a | : | |
| JACLYN SYKES | : | |

**DEFENDANT'S MOTION TO EXTEND DEADLINE
BY WHICH TO FILE PRETRIAL MOTIONS**

TO THE HON. RICHARD G. ANDREWS, JUDGE OF SAID COURT:

AND NOW comes Defendant Jaclyn McCain, by her attorney, Thomas A. Dreyer, Esquire, and respectfully requests the Court to enter an Order extending the time by which she must file pretrial motions and, in support thereof, avers the following:

1. By Indictment dated April 12, 2018, Defendant was charged with four counts of making false statements in violation of 18 U.S.C. 1001(a)(2) and one count of obstructing justice in violation of 18 U.S.C. Section 1512(c)(2).
2. Mr. Dreyer was subsequently appointed to represent Defendant.
3. On April 19, 2018, Defendant was arraigned and given to May 21, 2018 by which to file pretrial motions.
4. Defendant's mother recently informed Mr. Dreyer that she had retained private counsel, Joseph Hurley, Esquire, to represent Defendant.
5. To date, Mr. Hurley has not entered his appearance in this matter.
6. Defendant hereby seeks an extension of time of two months in order to give Mr. Hurley sufficient time to enter his appearance and preserve Defendant's right to

file pretrial motions.

7. Defendant waives her rights under the Speedy Trial Act, 18 U.S.C.

Sections 3161 et seq., between May 21, 2018 and July 20, 2018.

WHEREFORE, Defendant respectfully requests that the Court extend the deadline for the filing of pretrial motions from May 21, 2018 to July 20, 2018.

/s/ Thomas A. Dreyer

Thomas A. Dreyer, Esquire

6 Dickinson Drive

Building 100 – Suite 110

Chadds Ford, PA 19317

610-358-4454

Attorney for Defendant Jaclyn

McCain

Dated: May 18, 2018

CERTIFICATE OF SERVICE

Thomas A. Dreyer, Esquire, hereby certifies that he served a true and correct copy of the within Motion to Extend Deadline By Which to File Pretrial Motions upon the person named below on the date listed below by the Electronic Court Filing (“ECF”) System:

Alexander S. Mackler, Esquire
Assistant United States Attorney
The Nemours Building
1007 North Orange Street, Suite 700
P.O. Box 2046
Wilmington, DE 19899-2046

/s/ Thomas A. Dreyer
Thomas A. Dreyer, Esquire
6 Dickinson Drive
Building 100 – Suite 110
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610-358-4454
Attorney for Defendant Jaclyn
McCain

Dated: May 18, 2018